

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

|                                   |   |                  |
|-----------------------------------|---|------------------|
| DEBORAH BELLE,                    | ) |                  |
| individually, and on behalf       | ) |                  |
| of all others similarly situated, | ) |                  |
|                                   | ) |                  |
| Plaintiffs,                       | ) |                  |
|                                   | ) |                  |
| v.                                | ) | NO. L 02 CV 3309 |
|                                   | ) |                  |
| NCO FINANCIAL SYSTEMS, INC.,      | ) |                  |
| a Pennsylvania Corporation        | ) |                  |
|                                   | ) |                  |
| and                               | ) |                  |
|                                   | ) |                  |
| JOHN DOE                          | ) |                  |
|                                   | ) |                  |
| Defendants.                       | ) |                  |

---

**AGREED MOTION TO EXTEND DISCOVERY TIME PERIOD**

Plaintiff, through her counsel, moves this Court to grant the parties additional time in which to complete discovery. On August 4, 2003, the parties submitted a joint status report requesting until November 4, 2003 to complete discovery, including oral depositions. This joint status report was approved by the Court. The parties have been actively engaged in discovery and are in the process of completing written discovery and scheduling depositions. Plaintiff's counsel has requested the consent of Defense Counsel, David Israel, who has agreed to this extension. A proposed Order is attached.

Respectfully submitted,

---

Michael C. Worsham, Esquire  
1916 Cosner Road  
Forest Hill, Maryland 21050  
(410) 557-6192  
Maryland Federal Bar # 25923

Attorneys for Plaintiff

/s/  
\_\_\_\_\_  
Lisa M. Raimondi, Esquire  
Michelle D. Orton, Esquire  
Raimondi & Orton, Ltd.  
4305 N. Lincoln Avenue  
Chicago, Illinois 60618  
(773) 296-6583